Port of Lewiston

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U.S. Army Corps of Engineers
Northwestern Division
Attention: CRSO EIS
P.O. Box 2870
Portland, OR 97208-2870

Via e-mail: comment@crso.info

On behalf of the Port of Lewiston, Idaho's Only Seaport, thank you for the opportunity to provide comment on the scope of the Draft Environmental Impact Statement (EIS) for Columbia River System Operations (CRSO). As the most inland seaport on the west coast, businesses throughout the Pacific Northwest and Midwest utilize the Port of Lewiston to import and export commodities.

RIVER SYSTEM OVERVIEW

The U.S. Army Corps of Engineers is responsible for providing the Congressionally-authorized purpose of navigation in the Pacific Northwest. Through numerous acts of Congress from 1889 through 1962, the navigation channels, locks and other features were authorized for construction on the Columbia, Snake and Willamette Rivers. Every year since their construction, the Corps has been directed by Congress and funded to maintain these structures and features.

The Columbia Snake River System has developed into a vital trade gateway for the region and the nation. The system of eight navigation locks, inland 14' barging channel, deep draft 43' channel, and numerous other elements of federal navigation infrastructure like jetties and pile dikes all work together to ensure this river is able to move the nation's products safely and efficiently. Our river system made it possible for over 49 million tons of cargo to move in 2014. We are number one on the west coast for the export of wood products and mineral bulks, and second in the nation for soy exports. We are also first in the nation for wheat, with fully one half of the nation's wheat exports shipping overseas via the Columbia Snake River System. All told, this river system is the largest export gateway on the U.S. west coast.

These transportation benefits have been realized while also making significant improvements to the tributary and estuary habitats of our migrating fish, as well as world-class passage facilities at our hydropower projects. Thanks to historic partnerships between the federal agencies, tribes, states, and others in the region, there are now more fish in the river than at any time since the dams were built. Downstream fish migration survival rates average over 95%, and more improvements continue to be made at our hydropower facilities to further reduce their impact on migrating fish. Decades of effort have proven that the river system can provide commerce and energy while protecting our Northwest fish populations.

ALL "H" APPROACH

The EIS needs to fully evaluate the suite of environmental effects, and economic impacts, resulting from *all* federal governmental actions that affect the 13 individual species of steelhead and salmon in the Columbia Basin listed under the Endangered Species Act ("ESA"). Those actions include hydropower, habitat, harvest, and hatchery actions (the "4 H's"). Regional investments in the hydro and habitat "H's" have created a solid foundation for restoration of the listed stocks. However, only a comprehensive approach, which analyzes all the factors affecting salmon throughout their lifecycle, can identify and steer investment into those actions that result in the highest survival gains across all four "H's".

Additionally, should the federal agencies decide to analyze Snake dam or other FCRPS dam removal, the EIS must take a highly structured approach and include analysis of the environmental and economic changes any dam removal would cause in hydro system operations, power and transmission systems (including new lines and substations), water and irrigation systems, navigation and commerce, recreation and flood control, among others. The Port of Lewiston supports comments from Pacific Northwest Waterways Association and RiverPartners that provide more detail on potential impacts and issues on power, transmission, navigation, commerce and recreation and urges the agencies to take them into account in the EIS.

The Corps' 2010 dam breaching study plan developed as part of the Adaptive Management Implementation Plan (AMIP) for the 2008/2010 BiOp provides an excellent starting point for dam removal analysis. The agencies should build off this plan and previous studies including the 2002 "Lower Snake River Juvenile Salmon Migration Feasibility Study" and the 1997 System Operations Review.

SOCIOECONOMIC ANALYSIS

We recognize that you are seeking to identify the range of alternatives and impacts to be addressed in the CRSO EIS. Through the U.S. National Environmental Policy Act of 1969 or "NEPA" (P.L. 91-190, 42 U.S.C. 4371 et seq.), we understand that before any agency of the federal government may take "actions significantly affecting the quality of the human environment" that agency must first prepare a socioeconomic impact assessment as part of the EIS. A thorough socioeconomic impact analysis will ideally enable the agencies to make the most informed possible decisions regarding the complete costs and benefits of any contemplated changes to the operations and/or infrastructure of the Columbia Snake River System, and eventually the identification of the preferred alternative.

- Impacts to roads, railways, bridge piers, boat docks, terminals, and other shore side infrastructure

  While the dams themselves exhibited no damage from the 1992 test drawdown, other structures in those pools, including roadway and railroad embankments, piers, and boat docks, were damaged. Without the appropriate water levels, weakened soils could not provide the proper support for in-river and shore side infrastructure. In the extensive 2002 Lower Snake River Juvenile Salmon Migration Feasibility Study, the Corps documented significant impacts to federal highways, state highways, and railroads which were adjacent to the pools in the 1992 test drawdown. Road and rail embankments began to fail, resulting in cracking and movement of roads, damage to guardrails, and railroad track misalignment.

  According to the 2002 study noted above, a Corps field survey in August 1995 also identified 25 highway and railroad bridges that could be affected by permanent drawdown of the four lower Snake River reservoirs. These highway and railroad bridges were evaluated to determine the adequacy of the

existing bridge foundations and abutment protection to resist post-drawdown flood scouring to natural stream levels. Of the 25, all but two required some degree of protection.

In addition to the impacts to existing in-water and adjacent infrastructure, the removal of barging and shift of cargo to other modes would bring significant surface transportation maintenance and construction costs as well. The Washington legislature commissioned the Lower Snake River Drawdown Study to better understand statewide impacts if dams were breached. The 1999 study estimated that the state would incur hundreds of millions of dollars in corridor improvement costs and increased maintenance costs if barge navigation was eliminated by breaching or drawdown. On the Snake River alone, over 4.3 million tons of cargo was moved by barge in 2014, which kept 167,000 semi-trucks off the highways and 43,000 rail cars off the rail lines. Assuming these shippers are retained as U.S. exporters and not forced out of the market by higher transportation costs, their goods would need to move on already congested rail lines and/or local highways.

Increased safety risks are also likely to accompany any modal shifts for Northwest cargo shipping. The federal agencies must evaluate risks for the traveling public if there is a diversion of cargo transportation from relatively safe barging to higher risk transport modes.

- Impacts to the regional and national economy

The competitiveness of U.S. products overseas is greatly impacted by domestic transportation costs. Since drawdown and dam breaching would cut off access to our river ports and terminals, shippers would need to turn to more costly, less efficient modes of transportation.

The existence of barging as a cargo transport mode helps to discipline rail and trucking rates, ensuring that the price of moving goods in the Pacific Northwest remains competitive. A 2011 WSU study of the relatively brief closure of the river in the winter of 2010-2011 found that shipping rates for both truck and rail increased, to capitalize on the loss of barging.

A study by the Port of Portland, Oregon Department of Agriculture, ODOT, and OECDD in 2000 found that it is unlikely truck and rail could adequately absorb increased cargo volumes which would be displaced from the river after breaching. The study also found that some farmland values could be significantly decreased, and some farmland could be taken out of production altogether due to increased transportation costs.

It is also important to remember that commercial navigation on our inland system includes more than just barging cargo. The socioeconomic analysis must also capture the use of navigation infrastructure for cruise boats, yachts, and regular recreational boats. These vessels bring 27,000 visitors to the Lewis-Clark Valley annually. Four cruise lines, with a total of six boats, cruise from the mouth of the Columbia to the confluence of the Snake and Clearwater Rivers. Only one of those cruise lines go down and back in a single week. The rest "linger longer," spending money in communities along the route. Economic impact of the cruise boat industry is estimated at between $6 and $10 million annually.

Finally, it is important to note that the Columbia Snake River System shipping corridor has been developed into an integrated system of inland and deep draft navigation. This corridor must be examined as a complete system, and not limited to what some may view as a series of separable parts that are in their view expendable.

- General Comments

Following is a sampling of the direct and indirect socioeconomic impacts which must be evaluated in order to fully capture the costs and benefits of extreme measures like breaching and drawdown. All of these impacts would occur if breaching or drawdown were pursued as river system operation alternatives in the future. This list is not intended to be exhaustive or definitive.

- Water borne freight costs for shipping regional agriculture products to Portland will have to be replaced with more costly alternative methods. What is the estimated increase in commodity transportation costs for regional commodity exporters factoring in the loss of competition between barge and rail? Will the federal government subsidize the increased freight costs to exporters?
- Rail and highway infrastructure both inland and coastal would not be able to handle the additional commodity volumes shipped on the Columbia/Snake River System. How would rail and highway infrastructure be developed to handle the increased volumes? What are the associated construction costs and specifically who will be responsible to pay for construction costs?
- When examining alternatives that include dam breaching, the analysis must consider all dams on the Columbia/Snake River System.
- How will the carbon footprint of freight change with the loss of waterborne freight?
- How will the loss of hydro power generation be replaced with other "firm" sources of power?
- How much will electrical costs increase due to the loss of hydropower for the average household?
- How will the City of Lewiston's and Clarkston's infrastructure be impacted? What will happen to the existing levee system? Is the Corps responsible for future levee maintenance costs?
- How will municipal and private business NPDES be impacted?
- How will municipal and private water withdrawal permits be impacted?
- How will native vegetation and riparian areas be established and maintained? What impact will blowing dust have on Lewiston and Clarkston?
- What are the recreation/tourism impacts of eliminating the reservoir behind each dam?
- What is the long-term economic impact on the regional economy of dam breaching?
- If dams are breached, what is the confidence level of this action improving salmon and steelhead to recovery and/or sustainable levels? Is dam breaching an experimental action or does dam breaching guarantee salmon and steelhead recovery. If recovery is not achieved after a specified period of time, will the Federal Government reconstruct dams that have been breached?

The Port of Lewiston supports comments provided by the State of Idaho, Pacific Northwest Waterways Association, Northwest River Partners, the Lewis-Clark Chamber of Commerce, City of Lewiston, Nez Perce County and the Lewis-Clark Association of Realtors. We urge the agencies to take the comments from each of these entities into account in the EIS.

ENVIRONMENTAL ANALYSIS

In addition to a robust socioeconomic impact analysis, the agencies must also evaluate the environmental impacts of extreme measures like dam breaching and drawdown.

- Impacts to listed and non-listed fish

The Corps documented thousands of fish and smolt stranded and killed by the 1992 reservoir drawdown test. These included both resident fish loss as well as anadromous fish loss as water levels dropped. Additionally, the Corps noted the drawdown test had substantial negative impacts on bottom-dwelling benthic organisms, which form the food webs for resident and anadromous fish. All

of these documented impacts to listed and non-listed fish populations would occur if drawdown or dam breaching is pursued.

- Impacts to regional air quality

The WSU study of the winter 2010-2011 15-week closure found that emissions production also increased when barging was not available. The total change due to the loss of barge during the lock outage caused a 9 percent increase in overall emissions. Percentages of hydrocarbons, carbon monoxide, nitrous oxides and particulate matter all increased. Rail produces more emissions, including all components, when compared to barge. Truck produces more hydrocarbons and particulate matter when compared to barge.

The Port of Lewiston urges NMFS and the Action Agencies to take this opportunity to conduct a thorough and comprehensive analysis taking into account all 4 "H's" affecting salmon throughout their lifecycle to ensure an EIS that will meet the requirements of the law, address the Court's concerns, and produce meaningful measures and results for the listed species. We look forward to an exhaustive analysis by the federal agencies of the alternatives and impacts, including the issues and concerns we have noted above. Please feel free to contact my office if we may be of any assistance.

Sincerely,
PORT OF LEWISTON

Michael Thomason

Michael Thomason
Commission President